

United States District Court
for the
Southern District of New York
Related Case Statement

Full Caption of Later Filed Case:

Shmuel Brauner, et al.

Plaintiff	Case Number
vs.	24-cv-5788
Standard Chartered Bank	
Defendant	

Full Caption of Earlier Filed Case:

(including in bankruptcy appeals the relevant adversary proceeding)

Abraham Fraenkel, individually and for the
estate of Yaakov Fraenkel, et al.

Plaintiff	Case Number
vs.	24-cv-4484
Standard Chartered Bank	
Defendant	

Status of Earlier Filed Case:

☐

Closed

(If so, set forth the procedure which resulted in closure, e.g., voluntary dismissal, settlement, court decision. Also, state whether there is an appeal pending.)

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Open

(If so, set forth procedural status and summarize any court rulings.)

The earlier action was filed on June 11, 2024, and the defendant, Standard Chartered Bank, was served on July 17, 2024. Under a scheduling stipulation entered in the earlier case, the defendant's motion to dismiss the complaint is due on August 23, 2024. There have been no court rulings in the earlier case.

Explain in detail the reasons for your position that the newly filed case is related to the earlier filed case.

The newly filed case is against the same defendant--Standard Chartered Bank--and arises out of the same conduct as the earlier filed case. In both cases, the defendant is alleged to have violated the Anti-Terrorism Act by knowingly helping known fronts and agents of Iran's Islamic Revolutionary Guard Corps ("IRGC") evade anti-terrorism sanctions and access U.S. dollars over a multi-year span, which the IRGC used to sponsor terrorist attacks against Americans by its proxies, including Hezbollah, Hamas, and/or Palestinian Islamic Jihad, in Israel. The principal differences between the two complaints are the identity of the plaintiffs and the particular terrorist attacks in which they were injured (although one of the four attacks at issue in the newly filed case is also at issue in the earlier filed case). The operative complaints in both cases are otherwise nearly identical in all material respects.

Signature: s/ Adam J. Goldstein Date: July 30, 2024

Sparacino PLLC

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